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Attorneys for Plaintiff, CEIL ANN AKERS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CEIL ANN AKERS,)	
)	
Plaintiff,)	Case No.: 2:22-cv-00131-GMN-DJA
v.)	
)	
MOUNTAIN RUN SOLUTIONS LLC; and)	
EXPERIAN INFORMATION SOLUTIONS,)	PLAINTIFF’S UNOPPOSED FIRST
INC.,)	MOTION FOR AN EXTENSION OF
)	TIME TO FILE HER OPPOSITION TO
)	THE MOTION TO DISMISS FILED BY
Defendants.)	DEFENDANT, MOUNTAIN RUN
)	SOLUTIONS, LLC

Plaintiff, CEIL ANN AKERS (“Plaintiff”), through her undersigned counsel, respectfully requests that this Honorable Court, pursuant to LR IA 6-1, grant Plaintiff her first extension of time to file her opposition to the Motion to Dismiss filed by Defendant, Mountain Run Solutions LLC (“Defendant”), on July 11, 2022 (Doc. No. 25). In support thereof, Plaintiff state as follows:

1. Defendant filed its Motion to Dismiss on July 11, 2022. (Doc. No. 25).

2. Pursuant to LR 7-2, the deadline for Plaintiff to file her opposition to Defendant's Motion to Dismiss is July 25, 2022.
3. Defendant's Motion to Dismiss attacks Plaintiff's case both challenging personal jurisdiction as well as the pleading sufficiency of Plaintiff's underlying claims. (Doc. No. 25).
4. Plaintiff's counsel is unable to properly prepare and file an opposition to the broad attacks on Plaintiff's case within the fourteen (14) days allotted by LR 7-2, and also attend to all of his other responsibilities to his other clients.
5. Plaintiff's counsel believes that an additional fourteen (14) days, through August 8, 2022, will allow him to properly prepare and file an opposition to Defendant's Motion to Dismiss.
6. Plaintiff, and her counsel, therefore, request an additional fourteen (14) days, through August 8, 2022, to file an opposition to Defendant's Motion to Dismiss.
7. This is Plaintiff's first motion for an extension of time to file an opposition to Defendant's Motion to Dismiss.
8. Plaintiff's counsel has conferred with Defendant's counsel regarding the proposed extension, to which they do not object.

WHEREFORE, based on the foregoing, Plaintiff, CEIL AKERS, respectfully requests that this Honorable Court grant Plaintiff and her counsel, an extension of fourteen (14) days to file her

1 opposition to Defendant's Motion to Dismiss, from July 25, 2022 through August 8, 2022.

2 DATED: July 22, 2022

Respectfully submitted,
AGRUSS LAW FIRM, LLC


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4 By: /s/ James J. Parr

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14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated this 24 day of July, 2022.

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18 _____
19 Gloria M. Navarro, District Judge
20 UNITED STATES DISTRICT COURT
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